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MOUNTAIN COUNTIES WATER RESOURCES ASSOCIATION

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March 7, 2000

Paul Dabbs, Supervising Engineer
Statewide Planning Branch
Room 252-7A
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Re: Comments on the Public Scoping Process for the
California Water Plan, Bulletin 160-2003

Dear Mr. Dabbs:

Following are the comments of the Mountain Counties Water Resources Association on the Public Scoping Process for DWR Bulletin 160-2003. These comments are in addition to those delivered orally by the undersigned at the Public Scoping session held at the Central District Office in Sacramento on January 26.

The Association is composed of the counties and water districts and agencies located in the foothill and Sierra Nevada Region of California.

As DWR may recall from the Association's previous contacts on Bulletin 160-98, the members of the Association believe they share common geographic characteristics and common water supply and delivery problems. They do not feel that a presentation of those water supply characteristics is adequately served by the hydrologic region-by region approach of previous Bulletins.

The presentation and description of river systems having their headwaters in our region and which we rely upon for our supplies, were disjointed and scattered throughout the previous Bulletin's discussion of the Sacramento River Hydrologic Region and the San Joaquin River Hydrologic Region in Chapter 8. While a few changes were made in the final version of Bulletin 160-98 as a result of MCWRA's comments on the draft, a clear picture of our region and our

water resource problems was still essentially lost among the discussion of the CVP and SWP water supplies.

Discussion of the Cosumnes, Mokelumne and Tuolumne Rivers, which have their headwaters in the counties of our region, doesn't appear until well into the Chapter 8 discussion of the San Joaquin River Hydrologic Basin.

This unfocused presentation of the rivers, supplies and problems of our region results in a lack of understanding of our water resource issues and an understatement of our problems.

That is why in 1997 DWR's Central District Office began its effort in close cooperation with the Association to prepare a water resources management plan for our "Eastern Sierra Region". As the opening sentence of that report stated: "This water resources management plan is an attempt to more prominently recognize and discuss the unique water management issues and needs of the foothill and mountain areas of the interior regions."

The Association was disappointed when that salutary approach was ultimately discarded by DWR. That resulted in a treatment of our region's issues that was too abbreviated and spread out, resulting in a loss of understanding of the significance of our region and problems. We again request that DWR begin planning now to modify its treatment of our region to address the above-described Association concerns in the next Bulletin.

For purposes of the next Bulletin, it would also be helpful to expand the discussion to note that much of the State's water supply has its origin in our region, by a more complete geographic description of the region, to explain that our region must rely primarily for its water from storage and diversions from on-stream reservoirs, that we will rely on area of origin and watershed protection statutes for the implementation of our future water developments, and that the predicted year 2020 shortages (at least those determined in Bulletin 160-98) represented a very large percentage of our region's existing usage. It would be helpful to consolidate discussion of the general regional issues in the section described above, and integrate discussion of the rivers and water supply sources and issues which follow in the San Joaquin section. We refer you to the draft report prepared by the Central District for some good, comprehensive content.

MCWRA did commission the preparation of a report by Francis Borcalli and Associates to assess our region's existing water supplies and future needs which was completed in 1999. That report, "MCWRA, Water Needs Assessment, March

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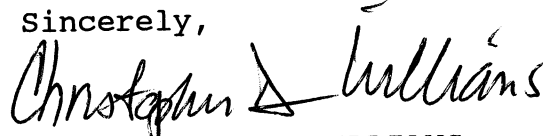
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1999," is enclosed and incorporated by reference in these comments. One of the findings of that study is that the water supply shortages projected for our region after 2020 appear to be less than originally thought and more specifically-localized, but in many cases will need to be met by additional storage.

Finally, we ask your consideration for appointment of an MCWRA representative as a member of the Advisory Committee on Bulletin 160-2003.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, reading "Christopher D. Williams". The signature is written in a cursive, flowing style. The first name "Christopher" is written in a larger, more prominent script, and "D. Williams" follows it in a similar but slightly smaller script. The signature is positioned above the printed name and title.

CHRISTOPHER D. WILLIAMS
Executive Director

Enc.

cc: MCWRA Board of Directors